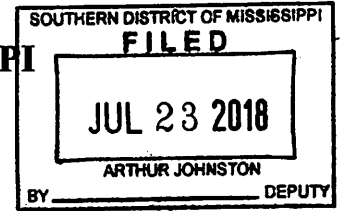


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT POINT
LODGE LTD OF NOVA SCOTIA & IN
THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, & ASHOKA

**RESPONSE IN OPPOSITION TO DEFENDANT LEARY'S
MOTION TO FOR A TEMPORARY RESTRAINING ORDER**

Plaintiff Douglas Handshoe respectfully submits this response in opposition to Defendant Charles Leary's Motion for a Temporary Restraining Order (ECF #262) and he will show that Mr. Leary's Motion should be denied.

Mr. Leary's Motion should be denied because his Motion does not comport to the Rules of Civil Procedure and involves Plaintiff's collection efforts involving a judgment against Mr. Leary in another matter before other Courts for which this Court lacks jurisdiction. Mr. Leary, an absconding, deadbeat Judgment Debtor and Contemnor, has been recently fraudulently transferred assets in both the United States and Canada to avoid execution on the underlying Judgment. Mr. Leary is currently evading service of process in Spain.

These matters are more fully discussed in the accompanying Memorandum that is contemporaneously filed with this Opposition.

Respectfully submitted this 23rd day of July, 2018,



Plaintiff
Douglas Handshoe
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CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on July 23, 2018 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on June 23, 2018, I mailed the foregoing to Charles Leary at 308 5th Ave E, Vancouver, BC V5T 1H4 Canada with a courtesy copy to foodvacation@gmail.com.

Respectfully submitted this 23rd day of July, 2018,



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